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December 18, 2002

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Mr. Dion Novak
Remedial Project Manager (SR-6J)
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd
Chicago, IL 60604-3590

Subject: WA No. 136-RSBD-B5Y7, Contract No. 68-W6-0025
Eagle Zinc Site, Hillsboro, Illinois
Review Comments of Revised Phase I Source Characterization Technical Memorandum

Dear Dion:

As requested, we have reviewed ENVIRON's Revised Technical Memorandum for Remedial Investigation Phase 1: Source Characterization and the associated proposed revisions dated December 2, 2002. CH2M HILL's comments to the revised Technical Memorandum and proposed revisions are attached.

We hope that you find our comments and recommendations helpful. Please call if you have any questions regarding this information.

Sincerely,

CH2M HILL

 Tim Biggs
Site Manager

Enclosure:

Eagle Zinc Revised Ph 1 TM Review Meeting Cover Letter.doc

c: Stephen Nathan, PO/U.S. EPA, Region 5 (w/o enclosure)
Dave Alberts, CO/U.S. EPA, Region 5 (c/o Thomas Harrison, CS) (w/o enclosure)
Ike Johnson, PM/CH2M HILL, MKE
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Remedial Investigation Revised Draft Phase I: Source Characterization Technical Memorandum Eagle Zinc Company Site (December 2002)

Comments to Environ Responses

1. Page 2, Response 4, 3rd sentence: Suggest changing "Figure II-2" to the proper reference "Figure II-1".
2. Page 6, Response 15, 2nd sentence: Suggest changing "lead" to "zinc".
3. Page 7, Response 19: No residue pile volume estimates were included. CH2M HILL assumes that the estimates will be included in the final Phase I Technical Memorandum.
4. Page 9, Response 26, 1st sentence: The response states that five of the 10 piezometers will remain as permanent piezometers and that the other five will eventually be abandoned. The revised narrative states that four of the 10 will remain as permanent piezometers and the other six will be abandoned. Will four or five permanent piezometers remain?
5. Page 9, Response 28, 2nd sentence: Suggest changing "Figure VI-2" to the proper reference "Figure VI-1".
6. Page 11, Response 33, last sentence: The sentence states that the four wells proposed for TCL organic and PCB analyses are shown on Figure VI-2. It appears that only three of the wells proposed for TCL organic and PCB analyses are depicted on this figure.

Comments to Revised Draft Phase I Technical Memorandum (Electronic Version-December 2, 2002)

7. Contents: The page numbers listed in the Contents section do not match the narrative page numbers. Suggest updating the Contents page numbers.
8. Page 5, Section B, 3rd paragraph, 2nd sentence: Suggest changing "Table II-2" to the proper reference "Table II-1".
9. Page 18, Section D, 1st paragraph, 6th sentence: Suggest removing this sentence as no surface soil samples (i.e., 0 to 1 foot below ground surface) were collected during Phase I, as stated in Section II, Part B ("...in all cases, sample depths were greater than 1 foot bgs.") and as summarized in Table II-1. Samples collected at depths greater than 1 foot bgs would not provide representative sample locations for residue pile material that had potentially been transported and deposited by airborne processes.
10. Page 20, Potential Contaminants of Concern table: The CSM should be updated, as revised Figure IV-4 has been, to include vinyl chloride as a PCOC for sediment as the concentration for sample SD-WD-9D exceeded the screening level for the soil to groundwater pathway.

11. Page 22, Potential Exposure Routes table: ecological receptors should be added to the "Potentially Affected Population" row of the "Residues" column. "Trespasser" is misspelled in the "On-Site Soil" column.
12. Page 24, Section A, last sentence: In addition to TAL metals analysis, suggest that all surface water samples that will be collected during Phase 2 of the RI be analyzed for sulfates as is listed in Table A-1 of the approved Field Sampling Plan. In addition, suggest that the northern-most (upgradient) surface water sample to be collected from the southwestern pond be analyzed for TCL organics. Sediment sample SD-WD-9D had vinyl chloride concentrations exceeding screening levels. This sample was collected from a drainageway that is a tributary of the southwestern pond.
13. Page 25, Section B, 1st bullet: The revised narrative states that four of the 10 wells will remain as permanent piezometers and the other six will be abandoned. The corresponding response to comment states that five of the 10 piezometers will remain as permanent piezometers and that the other five will eventually be abandoned. Will four or five permanent piezometers remain?
14. General: The Soil to Groundwater Pathway screening levels listed in the various Technical Memorandum tables assume a site soil pH of 6.9 to 7.24. It should be noted that determination of site-specific soil pH values will be necessary if pH-dependent soil remedial objectives are implemented at the site.

Figures

15. II-2: Soil sample location MA-8 (near the manufacturing area) should be depicted in red to indicate that samples from this boring were sent to the lab for analysis.
16. IV-4: Flow arrow of the stream segment between sediment sample locations SD-WD-1 and SD-WD-5 should indicate northward flow instead of southward flow.
17. VI-2: Response to comments states that the four wells proposed for organic analyses are shown on Figure VI-2. It appears that only three of the wells proposed for TCL organic and PCB analysis are depicted on this figure.